

REMARKS

Claims 1-10 and 15-18 have been examined and are pending in the present application.

I. Claim Rejections - 35 U.S.C. § 112

Claims 1-10 and 15-18 stand rejected under 35 U.S.C. § 112, first paragraph, as allegedly failing to comply with the written description requirement. In particular, the Examiner asserts that the specification does not disclose “said switch enables a simultaneous interaction with a website using both said control signal having said speech recognition related part and said control signal having said non-speech recognition related part.” Applicants respectfully disagree.

It is well settled that the subject matter of the claim need not be described literally (i.e., using the same terms or *in haec verba*) in order for the disclosure to satisfy the description requirement, but newly added claim limitations must be supported in the specification through express, implicit, or inherent disclosure. MPEP 2163 and 2163.02.

The present invention relates to a telecommunication system with at least parts of said I-net addresses (i.e., web address) being generated in response to control signals originating from said terminal, and with at least parts of said I-net information blocks (i.e., web pages) being sent from said memory to said terminal in the form of response signals (paragraphs 1, 2, 15 and 32). Control signals may include both speech-recognition related parts and non-speech recognition related parts (paragraph 9). In addition, the present specification discloses that both types of control signals (i.e., the speech-recognition related part and the non-speech recognition related part) can be sent together (paragraphs 33 and 34). That is, since the control signals control the access to web pages, a user may interact with a web page using both types, simultaneously (i.e., together). Thus, a detector 32 of a switch 3, for example, has a double function -- detecting

speech-recognition/non-speech-recognition related parts in response signals originating from memory 4 as well as in control signals originating from terminal 1 (paragraph 43). Thus, the user may use both keys or a mouse and speech for controlling the system to generate an I-net address and interact with a website (paragraph 10).

In view of the above examples, Applicants submit that the specification conveys with reasonable clarity to those skilled in the art that, as of the filing date sought, that the Applicants were in possession of the invention as now claimed. MPEP 2163.02, see also, e.g., *Vas-Cath, Inc. v. Mahurkar*, 935 F.2d 1555, 1563-64, 19 USPQ2d 1111, 1117 (Fed. Cir. 1991). Applicants also submit that the Examiner has not met the initial burden of presenting evidence or reasoning to explain why persons skilled in the art would not recognize in the original disclosure a description of the invention defined by the claims. MPEP 2163, see also *In re Wertheim*, 541 F.2d at 263, 191 USPQ at 97.

Therefore, Applicants respectfully request the Examiner to withdraw the 35 U.S.C. § 112, first paragraph, rejection.

II. Claim Rejections - 35 U.S.C. § 103

Claims 1-10 and 15-18 stand rejected under 35 U.S.C. § 103 (a) as allegedly being unpatentable over Urs et al. (US Patent 6,292,781). Applicants traverse the rejection based on the following comments.

A. Claims 1, 5, 8 and 10

Applicants' invention relates to a system which allows for a simultaneous interaction with a website by means of Wireless Application Protocol (WAP), HyperText Markup Language (HTML), etc., using speech and non-speech related control signals originating, for example, from a microphone or a computer mouse, respectively. Thus, the present invention

allows independent use of both a speech communication channel and a non-speech communication channel to, for example, navigate from a web page to a second web page by traversing a link.

Urs, on the other hand, merely relates to a pure voice application (i.e., performing distributed speech processing) configured for transmission of either encoded speech or data (Abstract). However, Urs fails to disclose a simultaneous interaction with a website using speech and non-speech related control signals, as acknowledged by the Examiner. In fact, Urs fails to teach or fairly suggest any interaction with websites according to the claimed present invention. Instead, Urs teaches a simultaneous voice and data mode and a voice only mode for a wireless communication service (telephone service) which performs distributed voice recognition and distributed speech synthesis (col. 1, lines 25-50; col. 2, lines 23-49; col. 4, lines 53-64; and col. 12, lines 3-14). Furthermore, when in voice only mode, the data path is not available and no longer uses a portion of the wireless communication resource (col. 12, lines 11-13). That is, Urs does not allow for the independent use of the data path.

In view of the above, Urs fails to teach or fairly suggest a switch which enables a simultaneous interaction with a website using both said control signal having said speech recognition related part and said control signal having said non-speech recognition related part, as recited in claim 1. Therefore, claim 1 should be patentable for at least this reason.

Furthermore, claims independent claims 5, 8 and 10 should be patentable for at least similar reasons set forth above.

B. Claim 15

Claim 15 recites that “the switch enables an independent use of a speech communication channel and a non-speech communication channel to navigate from a first web page to a second web page by traversing a link.” However, as set forth above, Urs fails to teach or suggest traversing web pages by links using speech communication channel and a non-speech communication channel (i.e., by using speech and non-speech related control signals). Urs merely serves the purpose of connecting currently used channels (speech or data) to a server for wireless communication (col. 11, lines 41-61). Thus, claim 15 should be patentable for at least this reason.

C. Claim 18

Claim 18 recites that “said address signal converted from said speech-recognition related part is a Uniform Resource Locator (URL) for an Internet server and said address signal converted from said non-speech-recognition related part is a URL for an Internet server.” The Examiner asserts that that Urs teaches an Internet 214. Therefore, it appears the Examiner is asserting that simply because the use of an Internet is taught, that Urs teaches the unique combination of features claim 18 recites in conjunction with claims 1 and 2. This line of reasoning is improper.

Urs merely teaches that a computer telephony platform uses the Internet 114/214 as a communication medium or network for supporting the communication service (col. 4, lines 15-20 and 39-42; col. 5, lines 56-63; and col. 6, lines 37-40). Nothing in Urs teaches or suggests

that an address signal (i.e., a URL or web address) is generated in response to control signals.¹

That is, Urs fails to teach converting an address signal for I-net information blocks (i.e., web pages) from speech-recognition related parts and from non-speech-recognition related parts (see claim 2).

Therefore, Urs fails to teach the features of claim 18. Applicants submit that claim 18 is patentable for at least this reason.

D. Remaining claims

Applicants submit that the remaining claims are patentable at least by virtue of their respective dependencies.

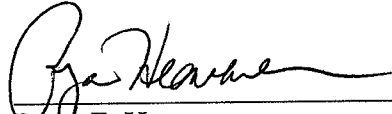
III. Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

¹ The present invention relates to a telecommunication system with at least parts of said I-net addresses (i.e., web address) being generated in response to control signals originating from said terminal, and with at least parts of said being sent from said memory to said terminal in the form of response signals (paragraphs 1, 2, 15 and 32).

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23373

CUSTOMER NUMBER

Date: December 19, 2008